

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
No. 25-cv-22896-KMW

FRIENDS OF THE EVERGLADES, INC., et al.,

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

DECLARATION OF JOSEPH KINNEBREW

I, Joseph Kinnebrew, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct based upon my personal knowledge and review of the relevant records:

1. I am an Airport Manager for the Miami-Dade Aviation Department, with responsibilities over the Dade-Collier Training and Transition Airport (TNT Airport). I am over 18 years and, if called, I could and would testify to the information provided herein.
2. On July 30, 2025, I emailed Ian Gadea-Guidicelli a document containing flight data for the TNT Airport. That document contains flight data captured by Virtower from January 1, 2025 to July 23, 2025. Virtower is a company that the Department can use to track flight data. The email to Mr. Gadea-Guidicelli is attached as Exhibit 1. The document attached to that email has been listed as Defendant's Exhibit 14 in this case.
3. This data, which is based on a Virtower antenna that was installed at TNT on November 11, 2024, captures both typical arrivals and departures, as well as "touch and go's." A

“touch and go” is an instance in which an aircraft will practice numerous runway landings and takeoffs without leaving the airport’s immediate airspace.

4. This data is for a different timeframe than the data referenced in my declaration dated August 5, 2025, which declaration related to TNT Arrival and Departure information for January 1, 2020 through December 31, 2024. The January 1, 2020 through December 31, 2024 data was based on the ANOMS software that I described in my August 5, 2025 declaration. Compared to Virtower’s data, ANOMS data is less reliable because, as I described in my August 5, 2025 declaration, it would record multiple touch and go’s (takeoffs and landings) as only one arrival/departure whereas Virtower’s data, as mentioned above, captures every touch and go (takeoff and landing) as a distinct arrival/departure.

5. To the best of my knowledge, this data is accurate and was maintained by Virtower to enable the Miami-Dade Aviation Department the ability to access such data when needed in the course of ordinary duties at the Miami-Dade County Aviation Department.

Executed on August 6, 2025, in Miami, Florida.

/s/ Joseph Kinnebrew
Joseph Kinnebrew
Airport Manager
Miami-Dade Aviation Department

EXHIBIT 1

10:45 5G+ 94

X

From: Kinnebrew, Joseph (Aviation)
<JKinnebrew@FlyMIA.com>
Sent: Wednesday, July 30, 2025 10:17 AM
To: Ian Guidicelli <ian.Guidicelli@em.myflorida.com>
Cc: Mark Moore <Mark.Moore@em.myflorida.com>
Subject: Operations Data 11/11/2024 - Current

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Ian,

As requested, I have attached the operations summary and the .csv file if you need to figure out operation counts for timeframes (daily, weekly, monthly, etc.). Virtower was installed on 11-11-2024, therefore data before that date would be unreliable.

Feel free to reach out if you need anything else.

V/r,

Joseph Kinnebrew, C.M.

Airport Manager, Miami-Dade Aviation Department

Exhibit 1